

## **European Critical Case Studies Influencing Study Abroad Programs**

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### **1. Introduction**

Study programs at home and abroad are an integral part of student life. Educational institutions and students both benefit enormously from such programs. It is therefore extremely important that programs are not put at risk for fear of litigation.

In the UK, the two largest teachers' unions, namely the National Union of Teachers (NUT), and the National Association of Schoolmasters & Union of Women Teachers (NASUWT), are divided in the advice they give to their teacher members about educational programs.

Whilst the NUT advocates the benefits of educational programs at home and abroad, the NASUWT advises its members against taking students on educational visits. It does so on the basis that its casework suggests a significant increase in problems arising from teachers' involvement in educational visits and that there are growing concerns about a seemingly increasingly litigious attitude among parents and students alike.

The NUT on the other hand firmly believes that the benefits of study programs, far and above outweigh the concerns and that such programs promote a rich and diverse education. Indeed, the vast majority of study programs pass without incident. This is confirmed by the decline in cases coming to court in recent years, evidence which is contrary to the widespread, popular belief that they are on the increase, as a result of the perceived "compensation culture".

Educational study programs bring what students have learnt in the classroom to life. They provide students with the opportunity to develop physical skills in challenging situations and to nurture important social skills such as teamwork and leadership. Life is not risk-free. Risk needs to be part of a young person's education and one of the best ways of teaching a student how to deal with risk is by allowing them to experience it in a controlled environment.

A recent NUT policy statement called "Bringing Down the Barriers" advocates an entitlement curriculum which could lead to a guaranteed entitlement for all pupils to a minimum number of outdoor activities and visits to museums and galleries.

In those rare cases where incidents do occur, it is perfectly reasonable to ask why they occurred, but if safety procedures have been followed, risk assessments carried out and a student's capabilities accurately assessed, then a safe platform should be provided for educational institutions to refute any claims made against them in negligence.

### **1.1 The Compensation Bill**

In pursuing a claim in negligence, a Claimant or Plaintiff student must establish first, the existence of duty of care owed to him or her by the relevant institution; second, that there was a breach of that duty by the institution; third, that harm or loss resulted, which was caused by the breach, and fourth, that such harm or loss was foreseeable.

It is worth mentioning at this juncture, a very recent development in the law of negligence in England and Wales. This has at its heart, the protection of individuals such as teachers and other individuals concerned with the provision of what are being referred to as 'desirable activities'.

The Queen, in her speech made upon the opening of Parliament in May 2005, announced that the Government would, in the current session of Parliament, introduce a Compensation Bill. The purpose of the Bill was twofold: firstly, to limit the work of claims management companies and secondly, to clarify the existing common law on negligence to make it absolutely clear that blame would have to be established before a claim could be made.

In a speech made 3 days later, the Prime Minister, Tony Blair, said:

*“The Bill will...clarify the existing common law on negligence to make clear that there is no liability in negligence for untoward incidents that could not be avoided by taking reasonable care or exercising reasonable skill. Simple guidelines should be issued. Compliance should avoid legal action. This will send a strong signal and it will also reduce risk-averse behaviour by providing reassurance to those who may be concerned about possible litigation, such as volunteers, teachers and local authorities.”*

Part 1 of the Bill, which is the provision relating to the law of negligence, makes it clear that when considering a claim in negligence, in deciding what is required to meet the standard of care in particular circumstances, a court is able to consider the wider social value of the activity in the context of which the injury or damage occurred. This is of particular significance with regard to the provision of study programs by educational institutions.

Part 1 reads as follows:

**“Negligence**

**1 Deterrent effect of potential liability**

*A court considering a claim in negligence may, in determining whether the defendant should have taken particular steps to meet the standard of care (whether by taking precautions against a risk or otherwise), have regard to whether a requirement to take those steps might –*

*(a) prevent a desirable activity from being undertaken at all, to a particular extent or in a particular way, or*

*(b) discourage persons from undertaking functions in connection with a desirable activity.”*

This principle is welcomed by educationalists as removing some of the threat of accusation and litigation which institutions feel when organising study programs. The Bill is of course intended to contain and tame the so-called “compensation culture”. It has been said that the “compensation culture” is something of a myth. Therefore, to attack it, if it does not really exist could be dangerous. It could deter genuine claimants from pursuing their right to legitimate compensation for harm or loss caused to them by the

fault of another. However, there is no doubt that the exploitation of the existing law of negligence by unscrupulous claims companies is perceived, with justification, by educational institutions in particular as a serious disincentive to the organisation of study programs which should be an important part of a student's educational experience.

The NUT is however opposing Clause 1 in its current form, as a means of tackling the problem. The reason for this opposition is that the Clause is drawn in a way which unacceptably dilutes the standard of care and creates unnecessary uncertainty in its application. The formula in the existing clause assumes that ordinarily, certain steps may be essential to maintain a required standard of care, but that there are circumstances in which these steps may be omitted. In other words, that safety measures which ordinarily would ensure safety can be ignored.

The NUT has therefore submitted an amendment in the following terms:

*"1 It shall be a defence to a claim in negligence to show that the particular steps the commission or omission of which are alleged to constitute negligence are or would be disproportionate in a comparison with the desirability of the activity to which the claim refers.*

*For the purposes of this section an activity shall be considered desirable if –*

- a) its being undertaken contributes significantly to the educational development of children and young persons at an educational establishment;*
- b) .....*
- c) ....."*

*Etc [these examples being such as other interest groups may wish to add]*

This substitutes a proportionality principle for the concept of a variable standard of care.

Whether the variable standards approach is adopted, or the proportionality principle, the idea is to force the courts to modify the law of negligence in tort in England & Wales, by

reducing the deterrent effect of threatened litigation against socially desirable activity. It is essentially an acceptance of inherent risk in worthwhile activities.

If the law is modified, then it is likely that much case law will be generated initially, whilst the boundaries are tested. Indeed, there may be Human Rights arguments raised, by the injured parties, on the basis that their right to compensation has been violated. This may lead to a period of uncertainty, but the longer term benefits should make it worthwhile.

## **2. Critical Case Studies**

Study abroad programs run by U.S. institutions will undoubtedly be influenced by the law of the countries in which the programs will be based. Whilst it is accepted that the number of U.S. students travelling to developing countries is on the increase, it remains the case that more U.S. students studying abroad, travel to Europe and in particular Britain than to any other parts of the world.

On that basis, it is worth examining some recent cases.

### **2.1 Hervé Bola (deceased)**

Hervé Bola was born in Congo, Africa. He came to England in about 1999, and lived with his grandmother in the London Borough of Redbridge. He went to school locally, where he learned to speak English.

Hervé left school in July 2002, at the age of 16. At that time, the London Borough of Redbridge was running a post-16 project targeted at school-leavers. Its aim was to encourage their continuing involvement in educational projects, offering a form of support during the transitional period from school to employment.

As part of the Project, one of the opportunities offered to Hervé, was participation in a one week residential outdoor activity course, based at Glasbury House in Wales. Glasbury House was owned by the London Borough of Redbridge.

Hervé's grandmother agreed that he could attend the residential course and completed the relevant consent form, indicating upon the form that Hervé was a non-swimmer. The form did not include a waiver or exclusion of liability clause, as may commonly be the case in the U.S.

On Sunday 28 July 2002, Hervé travelled from London to Wales in a group consisting of 13 male youths, and 5 members of staff employed by the London Borough of Redbridge. The party arrived at Glasbury House in Wales on the Sunday evening. The following morning they were divided into 2 groups. Hervé was allocated to Group B, along with 5 other youths. Group B was to be led by Mr Ian McLeod, an experienced instructor based at Glasbury House since 1971. Group B was to undertake an 'adventure day'. Prior to leaving Glasbury House, the group was told emphatically that the instructor's directions should be followed at all times. In addition to Mr McLeod, Group B was accompanied by 3 of the 5 members of staff who had travelled with the youths from London to Wales.

The 6 young men in Group B, and the 4 members of staff then travelled to a local beauty spot where there is a river which feeds a number of waterfalls and plunge pools. The group, under the direction of Mr McLeod undertook a number of activities during the course of the day, such as abseiling. It was a hot July day and local people were jumping into the river and its plunge pools, to cool off. The young men in Group B, asked Mr McLeod, whether they too would be able to go into the water. Mr McLeod responded with "we'll see at the end of the day". During the course of the abseiling activity, Hervé Bola had spoken with Mr McLeod, stating that although he couldn't swim he was going to go into the water. Mr McLeod's response was "you mustn't go in the water or you'll drown". Indeed, Hervé had remarked on other occasions during the day that he was going to go into the water.

Following the completion of the day's activities, the young men once again asked if they could go in the water to cool off. Mr McLeod asked which of them were non-swimmers and Hervé and another member of the group raised their hands. They were told not to go in the water, but the swimmers in the group were allowed to do so.

The young men were then led to what was deemed to be a suitable pool, where they started to jump in to cool off. The splash pool itself was small. At no point could

someone be more than a few feet away from the edge. Mr McLeod positioned himself directly opposite the splash pool, where he could see exactly what was going on. The other 3 members of staff stood near the ledge or platform from which the young men were launching themselves into the water. One of the 3 members of staff, a young man by the name of Daniel Brown, joined the youths in jumping into the water. Daniel himself, was only 21 years of age at that time.

Hervé Bola, who had been sitting away from the platform where his friends were jumping into the water, then made his way to the platform and jumped into the plunge pool. As he was about to jump, Mr McLeod shouted at him to stop, but Hervé entered the water.

Daniel Brown was already in the water and he made every effort to save Hervé. Indeed, there was a ledge within arm's length, from where Hervé had entered the water, which the other youths had been using to lift themselves out of the pool. Mr McLeod remained on the bank, from where he threw in a rope to assist Daniel in Hervé's rescue. Another visiting member of staff was then directed to enter the water by Mr McLeod. He did so, but as Mr McLeod didn't like the way in which events were unfolding, he entered the water himself in an attempt to save Hervé.

Mr McLeod swam towards Hervé, but as he reached for him, Hervé, who was approximately 6 feet tall, was thrashing about in panic and disappeared under the water. Mr McLeod then dived deep in an attempt to find Hervé, but he was unable to locate him.

Eventually, the police arrived at the scene, and with their assistance, Hervé's body was recovered from the bottom of the pool.

A couple of days after Hervé's death, it was alleged by his friends in group B, that Daniel Brown, the member of staff who had been in the water when Hervé jumped in, had encouraged Hervé to enter the water. This was categorically denied by Daniel. Daniel accepted that he had called one of the other staff members, Darryl Grout, into the water, saying, "Come in mate, it's fun", but he emphatically denied having called in Hervé. Whilst other staff present heard Daniel call in Darryl, none of them heard him encourage

Hervé to enter the pool. Indeed, Mr McLeod said that if he had heard such a thing he would have reprimanded Daniel immediately.

Various legal processes were set in motion following this tragic incident.

To begin with, there was a police investigation, during the course of which all present at the scene were interviewed. In addition, members of staff who had been involved in the organisation of the trip were interviewed even though they had not been present when Hervé drowned. The police investigation took some time to be completed, but eventually, it was decided by the Crown Prosecution Service that no further action would be taken against the staff and in particular Daniel Brown, as there was insufficient evidence to support a manslaughter prosecution. During the course of their investigation, the police had requested that a report be prepared by Mr Marcus Bailie, the Head of Inspection of the Adventure Activities Licensing Authority (AALA). AALA monitors and licences activity centres in the UK. Mr Bailie concluded that:

*“Had not Hervé thrashed around so violently I believe he would have been assisted to safety without difficulty. Indeed, having stood on the bank of that pool myself it is, quite literally, inconceivable to envisage how someone could have drowned there under the circumstances described. And if it is inconceivable after the event it must surely have been unforeseeable to those present before the event.*

*Thus in either eventuality [i.e. whether Daniel called Hervé into the water or not] I do not believe that Daniel could have foreseen the outcome. At best he was heroic, at worst ill-advised.”*

Mr Bailie went on to say that:

*“Inconsistencies in the statements made by the boys leads me to consider their evidence unreliable with respect to whether Daniel tried to persuade Hervé to jump into the pool. I am drawn to the view therefore that he did not.”*

Hervé’s family were dissatisfied with this. They indicated that they would be pressing for a verdict of unlawful killing in relation to Daniel Brown, at the subsequent Coroner’s Inquest into Hervé’s death. This was with a view to having the police investigation re-opened.

It was almost 3 years later that the Inquest was convened in Neath, Wales, which is where Hervé's death occurred. This was not before Hervé's family had requested the Inquest be transferred to London, a request which the Coroner refused. As a result, Hervé's family applied for a Judicial Review of the Coroner's decision not to transfer, as well as of his decision to grant them only limited expenses for their attendance at the Inquest. The Inquest was held in April 2005 and lasted 8 days. In his summing up the Coroner warned the jury that for them to reach a verdict of unlawful killing, they must be sure beyond reasonable doubt that Hervé died as a result of 'Gross Negligence Manslaughter'. On the other hand, if the jury found on the evidence that it was probable that Hervé's death occurred as a result of an unintended act, or a deliberate act which unintentionally led to death, then accidental death/misadventure was the appropriate verdict.

In a 6-3 majority vote, the jury returned a verdict of unlawful killing.

The matter is not at an end. Following the Inquest, an application for a Judicial Review of the verdict was lodged in the High Court of Justice in London. Whilst permission to proceed with the Judicial Review has been granted by the Court, the hearing is not expected to take place until March 2006 at the earliest - almost 4 years since Hervé's death. The main grounds of the submission for the Judicial Review, are that the Coroner should not have left a verdict of unlawful killing open to the jury, because, even if Daniel Brown had called Hervé into the water, this could not have amounted to the crime of gross negligence manslaughter.

In addition, it is stated that the Coroner in his written directions to the jury, directed that for a verdict of unlawful killing, the jury had to find that the words used by Daniel Brown created a foreseeable risk of harm. The correct direction should have been 'foreseeable risk of death'. The Coroner did correct this in his oral summing up, but nevertheless, the jury was left with his written summing up, when they retired to consider their verdict.

It is likely that the police will await the outcome of the judicial review before re-opening the criminal investigation.

Meanwhile, a civil claim in negligence is being pursued by Hervé's family against the London Borough of Redbridge.

In addition to the above, there has of course been an internal investigation carried out by the London Borough of Redbridge, involving all staff concerned with the trip to Glasbury House. The internal investigation concluded that all of the correct procedures had been followed.

In all this, let us not forget the involvement of the Health & Safety Executive (HSE), the body responsible for health and safety regulation in the UK. The HSE, along with local government, are the enforcing authorities who work in support of the Health & Safety Commission. They have carried out their own investigation and may lodge a prosecution, which if successful, could result in a heavy fine for the London Borough of Redbridge.

What can a U.S. institution learn from a case such as this?

- At the Inquest, much was made of the Consent Form that Hervé's grandmother had signed. It was upon this form that she had indicated Hervé was a non-swimmer. Consent Forms need to be as detailed as possible without being too onerous to complete. An institution should therefore consider including a question about a student's swimming ability which goes so far as to request details of the distance a student can swim and whether the student has any swimming certificates or qualifications. As well as granting permission for the student to receive medical treatment in an emergency, it is also good practice for a Consent Form to indicate that the student understands the need to comply with any rules and/or instructions given by the staff. It is imperative that organisations follow accepted guidance when drafting such Consent Forms.
  
- Where any of those involved do not speak English as their first language, an institution should make sure they understand what they are being told to do and that they can properly complete any forms. In this case it was accepted that Hervé had a good command of the English language. An interpreter was,

however, required in Court for the duration of the Inquest, in order to translate the evidence for Hervé's grandmother and mother, whose first language was French.

- An institution should ensure the Consent Forms are looked at by the appropriate member of staff and any issues raised with the student before the trip departs. It is also of vital importance that any problems or special requirements are brought to the attention of the host organisation and its staff, in advance of the trip. The visiting and host staff need to know where their individual responsibilities lie; there must be clear line management.
- When Mr McLeod gave his evidence at the Inquest, he was pressed in relation to the issue of Risk Assessments. He explained that whilst paper-based assessments were carried out, there is also the need for the instructor to conduct what he called a 'dynamic' Risk Assessment. That is to say, an institution needs to be aware that an instructor, taking a group of students into an environment with which the group is not familiar, needs to have constant regard to factors such as the weather, terrain, behaviour of the group, how they relate with one another and what their individual abilities are. One has to accept that it is not always possible to document every risk and the experience of the person leading the group is therefore very important.
- The common law concept of foreseeability is a key issue and directly relates to the Risk Assessment process which is a statutory concept. If a risk is foreseen and reasonable steps taken to reduce that risk, then this can be used to refute a claim. Although, from this case, it is clear that when an incident is unforeseeable and this is confirmed by an appropriate expert, it is very hard to predict even then, what conclusions an Inquest jury will reach.
- An institution needs to make sure the host organisation's licence to conduct activities of the kind specified is up-to-date and that the instructors themselves are appropriately qualified and that those qualifications have been renewed as required, by attendance on 'refresher' courses. Further, make certain that all internal emergency procedures and support mechanisms are in place, so that they may be followed immediately an incident occurs.

- An institution needs to ensure there is a good ratio of staff to students. On the day of Hervé's death, there were 4 staff to 6 students. A very good ratio on all accounts and one for which the institution could not be criticised.
- The remoteness of certain areas needs to be taken into account. In this case, the nearest public telephone was a mile away. The area itself was wooded and so there was a very poor cellphone reception. This meant that one member of the group had to run a mile to the nearest public telephone, to alert the emergency services to what had happened.
- Institutions and their employees have to be aware that they may be faced with criminal prosecutions, civil claims, the prospect of an Inquest where there has been a fatality, and as far as the employees themselves are concerned, where they are considered culpable, the prospect of internal disciplinary procedures which could result in them losing their jobs. Such proceedings may well take years to reach a conclusion. In that time, employees will need tremendous support. An institution does not want to find itself being sued by an employee involved in such an incident, for the occupational stress caused by mismanagement and lack of support during such a difficult time. Also, further trips to the host country and even the incident location itself, may be required during the legal proceedings.

## **2.2 Gemma Carter (deceased)**

It is important to bear in mind the differences between the various legal systems in the EU member states. In England & Wales, we have an adversarial system, whereas in France and many other European countries, an inquisitorial system is in place.

On the evening of 8 June 1999, a group of school children on a school trip to Le Touquet, France, was taken to the beach to play in the shallows. As the group prepared to return to the hotel, one of Gemma Carter's friends noticed she was missing. The group had broken up, some having already returned to the hotel. As Gemma could not be seen and there was no suggestion she had been in difficulty in the water, it was

assumed she had gone back to the hotel. Upon returning to the hotel, a head-count of the group confirmed Gemma's absence. A search of the seafront was then conducted but to no avail. The emergency services were telephoned and a while later a fireman informed Gemma's teacher, Mr Mark Duckworth, that Gemma's body had been found.

Mr Duckworth, was given a 6 month suspended sentence by the French court, for involuntary homicide. The nearest equivalent to this offence in English law is that of manslaughter. In a subsequent appeal against the conviction, Mr Duckworth's conviction was quashed, on the basis that there was insufficient evidence of gross negligence amounting to involuntary homicide.

However, unlike in the case of Hervé Bola, the Inquest jury in England reached a verdict of death by misadventure. The Inquest was heard following Mr Duckworth's successful appeal against his conviction. Whilst death by misadventure was a better verdict for Mr Duckworth than unlawful killing would have been, he was still criticised by the jury, who were invited to provide a 'narrative' verdict by the Coroner.

This case exemplifies the following:

- A lawyer will need to be retained in the foreign jurisdiction, one who is familiar with the law and procedures applicable. In the French system the preliminary police report and autopsy results are forwarded to the public prosecutor, who will assess the evidence and, if he or she considers it necessary, open a formal judicial inquiry headed by an Investigating Magistrate. The Magistrate then orders further investigations with the object of bringing a case to court. The potential charges could be negligence, failure to come to the assistance of persons in danger, or involuntary homicide (manslaughter).
- The French system is not without its problems. It is extremely bureaucratic. The Defendant is not given a full hearing as he or she would be in England & Wales. Much of the case is dealt with on paper, although the opportunity is provided for cross-examination of witnesses. Indeed, in this case, Mr Duckworth was convicted in a hearing that lasted a matter of hours, whereas in the UK, such a case would be likely to take weeks.

- A decision had to be made as to whether the individual concerned should be temporarily removed from field trips or study programs, until such time as the legal proceedings had been concluded. In this respect, one must accept that this could be interpreted as a presumption of guilt. Mr Duckworth was suspended from his employment pending the outcome of the proceedings.
- There may well be liability in more than one jurisdiction. Criminal proceedings were begun in France, with a civil claim for damages attached. The French civil claim was subsequently abandoned by Gemma's mother, and civil proceedings begun in England, against the education authority. Bear in mind also, that a civil claim for damages in England & Wales, in a case such as this, is likely to be very small in financial value. Such a claim, may not attract more than the statutory bereavement award which currently stands at £10,000. As a result, an institution may for economic reasons, be inclined to settle a civil claim early on. Consideration should however be given as to whether it is best to wait the outcome of other processes, such as the Coroner's Inquest. Different countries have different limitation periods for the commencement of proceedings. It is worth being aware of the differences.
- Mark Duckworth was criticised for conducting inadequate Risk Assessments. It is always best to Risk Assess prior to a foreign trip or study program, but the reality is that this may not always be possible. Educational institutions need to give serious consideration to going to the expense of doing so. The benefits will certainly be worthwhile and in the event of an incident later occurring, the Risk Assessment could help in establishing that the institution had taken all reasonably practicable precautions.

### **2.3 Another case example:**

In another recent case, a party of students were taken on a field trip to Germany. During the course of the trip, the students attended a 'water' park. Having used the facilities at the park, some of the female students returned to the changing facilities. The facilities had a unisex communal area with cubicles leading off it for greater privacy, as well as

separate shower areas for males and females. Two of the female students, who were in the communal area were harassed by a number of German males, who made inappropriate comments to them and also indecently assaulted them.

There was no member of staff present at the time. When staff members were alerted to what had happened, security was called, as were the police. The students' assailants were quickly identified and located in the water park. They were then arrested.

The students themselves were taken to the local police station where they were interviewed. Their assailants were later charged by the police.

The visiting staff offered the appropriate support and assistance to the students. It was anticipated that the students would be required to return to Germany to give evidence in the criminal proceedings, but this was not the case. The German police dealt with the matter on the basis of the written statements obtained at the time.

This case raises various issues:

- The visiting staff were commended by the students' parents for the way in which they handled matters. There was no suggestion that the staff had been negligent. Indeed, it would have been very difficult to argue that the incident was foreseeable.
- The German authorities were keen to ensure that there was no need for the students to return to Germany, so as much evidence as possible was gathered at the time. It was indicated that any further information could be obtained with the assistance of the home police force, collaborating with the German police force. Whilst there may be a tendency to bring students home as soon as possible after such an incident, co-operation with the foreign authorities in the provision of detailed, contemporaneous evidence, may alleviate the need for a return trip. However, the students must be offered full and appropriate support at this time.

- Once again consider retaining a lawyer in the foreign jurisdiction. He or she may be your best point of contact, and only means of being kept updated in relation to the way in which matters are progressing.
- Different countries have different facilities to those you may be used to. It is not uncommon in Europe to have communal areas for both male and females. Attitudes are more relaxed. Bear this in mind when planning study programs and field trips.

### **3 Conclusion**

Fortunately, the cases discussed in this paper are few and between. Indeed, one of the reasons they make the headlines is because they are so rare. Yet, with careful planning and preparation in the form of Risk Assessments, many incidents can be avoided. And even if they are not, the fact that the Risk Assessment process has been carried out, is evidence of the institution having taken reasonably practicable steps in an attempt to safeguard the health and safety of its students and employees. This will work in the institution's favour during the course of any legal proceedings.

When incidents such as those documented above do occur, they attract a huge amount of media interest. This alone can be extremely difficult for the individuals involved to deal with. In certain European countries, the media can be very intrusive. In such circumstances the most prudent course is to refrain from offering the press any comment until the conclusion of the proceedings. Even then, it is good practice for the institution to have one designated spokesperson, thereby controlling releases to the press.

It can also be very difficult for the lawyers involved, as it is no easy task, having to deal with clients for whom much is at stake and who are extremely distressed and under a great strain as a result of the predicament in which they find themselves.

Nonetheless, the undeniable benefit of study programs abroad has to be recognised. Such programs are character-building, life-enriching experiences, which many students will not have the opportunity to partake in again. It is therefore crucial that legal processes do not reduce or impede their development.

In following best practice guidelines, such as those issued by the Department for Education & Skills in England, and exercising care and caution, institutions can reduce the risk of litigation and criminal sanctions to a low level.

In Wales, ACCAC, the statutory assessment and curriculum body has recently set out and I quote, “a vision..... of a curriculum that is more inclusive, and better prepares young people for life and work.” That is our challenge. We do our young people no favours if we shirk our challenges for fear of the consequences.

**Useful Links:**

[www.teachers.org.uk](http://www.teachers.org.uk)

[www.hse.gov.uk](http://www.hse.gov.uk)

[www.dfes.gov.uk](http://www.dfes.gov.uk)

[www.hmcourts-service.gov.uk](http://www.hmcourts-service.gov.uk)

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